

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	CRIMINAL NO.
)	
v.)	18 U.S.C. § 371
)	Conspiracy to Commit Bank Fraud, Social
ALVIN J. PATTON,)	Security Fraud and Pass Counterfeit Checks
aka "Nathaniel A. Wright")	(Count 1)
aka "Mohammed Abullah")	
(Counts 1-7, 10-15))	18 U.S.C. §§ 1344 and 2
)	Bank Fraud
KEVIN A. MOSES,)	(Count 2)
aka "Christopher J. Harris")	
aka "Michael Washington")	18 U.S.C. §§ 513 and 2
(Counts 1-10, 12, 14-15))	Passing Counterfeit Checks
)	(Counts 3-7)
and)	
)	18 U.S.C. §§ 1028(a)(7) and 2
SHAKIMA MOSES,)	Identity Theft
aka "Shakyma Jones")	(Count 8)
aka "Stephanie Davis")	
(Counts 1-7, 13))	18 U.S.C. §§ 912 and 2
)	Impersonation
)	(Count 9)
)	
)	42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2
)	Social Security Fraud
)	(Counts 10-14)
)	
)	18 U.S.C. §§ 1029(a)(2) and 2
)	Credit Card Fraud
)	(Count 15)

INDICTMENT

February 2002 TERM - AT RICHMOND

THE GRAND JURY CHARGES THAT:

COUNT ONE

At all relevant times:

1. Defendants, ALVIN J. PATTON, aka "Nathaniel A. Wright," aka "Mohammed Abullah," KEVIN A. MOSES, aka "Christopher J. Harris," aka "Michael Washington," aka "Edward S. Martin, Jr.," and SHAKIMA MOSES, aka "Shakyma Jones," aka "Stephanie Davis," were present in the Eastern District of Virginia.

2. An unindicted co-conspirator, the live-in girlfriend of ALVIN J. PATTON, aka "Nathaniel A. Wright," aka "Mohammed Abullah," was working as a clerk at the Laburnam Avenue, Richmond, Division of Motor Vehicles (DMV).

3. On September 10, 2001, the unindicted co-conspirator provided ALVIN J. PATTON, aka "Nathaniel A. Wright," aka "Mohammed Abullah," with a legitimate drivers license in the name of "Nathaniel Wright."

4. On September 24, 2001, at the request of ALVIN J. PATTON, aka "Nathaniel A. Wright," aka "Mohammed Abullah," the unindicted co-conspirator provided KEVIN A. MOSES, aka "Christopher J. Harris," aka "Michael Washington," aka "Edward S. Martin, Jr.," with a legitimate drivers license in the name of "Christopher J. Harris."

5. On September 24, 2001, at the request of ALVIN J. PATTON, aka "Nathaniel A. Wright," aka "Mohammed Abullah," the unindicted co-conspirator provided SHAKIMA MOSES, aka "Shakyma Jones," aka "Stephanie Davis," with a legitimate drivers license in the

name of “Stephanie Davis.”

6. On October 18, 2001, at the request of ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” the unindicted co-conspirator provided KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.” with a legitimate drivers license in the name of “Edward S. Martin, Jr.”

7. First Virginia Bank is and was a financial institution whose accounts and deposits are and were insured by the federal government.

8. From at least in or about September 2001, and continuing until in or about October 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court, defendants, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” and SHAKIMA MOSES, aka “Shakyma Jones,” aka “Stephanie Davis,” and other unindicted co-conspirators, did knowingly, willfully, and unlawfully feloniously combine, conspire, confederate and agree together to commit an offense against the United States, that is, they:

a. did agree and conspire to knowingly and unlawfully execute a scheme to obtain moneys under the custody and control of a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344; and

b. did agree and conspire to knowingly and unlawfully illegally possess and utter a counterfeited security of an organization, with the intent to deceive another person and organization in violation of Title 18, United States Code, Section 513(a); and

c. did agree and conspire for the purpose of obtaining something of value, with intent to deceive, to knowingly, willfully, and unlawfully falsely represent the Social Security number of another to be the Social Security account number assigned by the Secretary of the United States Department of Health and Human Services to themselves, in violation of Title 42, United States Code, Section 408(a)(7)(B).

WAYS, MANNER AND MEANS

9. The ways, manner, and means by which the defendants carried out the illegal purposes of the conspiracy include, but are not limited to, the following:

a. It was a part of the conspiracy that the defendants would and did knowingly and wilfully use counterfeit First Virginia Bank checks to purchase automobiles in the Eastern District of Virginia and then convert the automobiles to their own use.

b. The defendants would and did knowingly use fraudulent identification documents and Social Security Numbers.

c. The defendants played different roles, took upon themselves different tasks, and participated in the affairs of the conspiracy through various criminal acts. The defendants adopted and carried out various roles at various times during the life of the conspiracy.

OVERT ACTS

10. In furtherance of the conspiracy the defendants performed acts in the Eastern District of Virginia, including, but not limited to, the following:

a. On September 10, 2001, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” obtained a legitimate drivers license in the name of “Nathaniel Wright,” with the legitimate Social Security number assigned to “Darren C. Miller,” with the assistance of

an unindicted co-conspirator who worked at the Laburnam DMV.

b. On September 24, 2001, KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” obtained a legitimate drivers license in the name of “Christopher J. Harris,” with the legitimate Social Security number assigned to “Jerry M. Gentry,” with the assistance of an unindicted co-conspirator who worked at the Laburnam DMV.

c. On September 24, 2001, SHAKIMA MOSES, aka “Shakyma Jones,” aka “Stephanie Davis,” obtained a legitimate drivers license in the name of “Stephanie Davis,” with the legitimate Social Security number assigned to “Lacey Williams,” with the assistance of an unindicted co-conspirator who worked at the Laburnam DMV.

d. On October 18, 2001, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” asked the unindicted co-conspirator to provide KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” with a legitimate drivers license in the name of “Edward S. Martin, Jr.,” and the drivers license was produced using the legitimate Social Security number assigned to “Edward S. Martin, Jr.”

e. On September 26, 2001, KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” and SHAKIMA MOSES, aka “Shakyma Jones,” aka “Stephanie Davis,” purchased three vehicles from Patriot Auto Sales using five counterfeit checks totalling \$21,840.24, drawn on fraudulent accounts at First Virginia Bank. (In violation of Title 18, United States Code, Section 371.)

COUNT TWO

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about September 26, 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court, defendants, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” and SHAKIMA MOSES, aka “Shakyma Jones,” aka “Stephanie Davis,” aided and abetted by one another, knowingly and unlawfully executed a scheme to defraud First Virginia Bank and to obtain moneys and funds under the custody and control of First Virginia Bank by means of false and fraudulent pretenses, representations, and promises, to wit: knowingly presented five counterfeit checks totaling \$21,840.24, drawn on fraudulent checking account numbers at First Virginia Bank in the names of “George Lonzo,” and “Kevin Moses,” which were presented to Patriot Auto Sales in Chesapeake, Virginia, to purchase one 1994 Lincoln Mark VI, VIN #1LNLM91VXRY666659, one Chrysler Sebring, VIN #4C3AU52N4TE371705, and one Mitsubishi Galant ES, VIN #4A3AJ56G3SE025769.

(In violation of Title 18, United States Code, Sections 1344 and 2.)

COUNTS THREE through SEVEN

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about the dates listed below, in the Eastern District of Virginia, and within the jurisdiction of this Court defendants, KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” and SHAKIMA MOSES, aka “Shakyma Jones,” aka “Stephanie Davis,” aided and abetted by ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” unlawfully passed and aided, abetted, counseled, commanded, induced, and caused to be passed a counterfeited security, with the intent to deceive

another person and organization, to wit: counterfeited personal checks from accounts in the name of “George Lonzo” and “Kevin Moses,” made payable to MAG, which were presented to Patriot Auto Sales in Chesapeake, Virginia, to purchase one 1994 Lincoln Mark VI, VIN #1LNLM91VXRY666659, one Chrysler Sebring, VIN #4C3AU52N4TE371705, and one Mitsubishi Galant ES, VIN #4A3AJ56G3SE025769, which they then converted to their own use:

<u>COUNT</u>	<u>DATE</u>	<u>CHECK NO.</u>	<u>CHECK AMOUNT</u>
3	9/15/01	2761	\$4,490.04
4	9/22/01	2525	\$4,787.88
5	9/24/01	2521	\$4,998.00
6	9/25/01	2542	\$4,999.02
7	9/26/01	2540	\$2,565.30

(In violation of Title 18, United States Code, Sections 513 and 2.)

COUNT EIGHT

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about October 18, 2001, in the Eastern District of Virginia and elsewhere and within the jurisdiction of this Court, defendant, KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.” did knowingly use, without lawful authority, a means of identification of another person with the intent to commit an unlawful activity that constitutes a felony, to wit: used the name and social security number of Edward S. Martin, Jr., with the intent to commit social security fraud, in violation of Title 42, United States Code, Section 408(a)(7)(B), and bank fraud, in violation of Title 18, United States Code, Section

1344.

(In violation of Title 18, United States Code, Section 1028(a)(7).)

COUNT NINE

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. In or about October 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court, defendant, KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” did falsely assume and pretend to be an employee of the United States acting under the authority thereof, that is a member of the United States Armed Forces, and in such assumed and pretended character did demand and obtain any money, paper, document, and thing of value, in that he attempted to pass a counterfeit check at Target Store in Richmond, Virginia..

(In violation of Title 18, United States Code, Section 912.)

COUNT TEN

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about October 18, 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court defendants, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” and KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” aided and abetted by one another, for the purpose of obtaining something of value, with intent to deceive, did knowingly, willfully, and unlawfully falsely represent the Social Security number of Edward S. Martin, Jr., to be the Social Security

account number assigned by the Secretary of the United States Department of Health and Human Services to KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” to obtain credit from Circuit City, when, in fact, defendants ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” and KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” then well knew such number was not the Social Security account number assigned by the Secretary to KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.” (In violation of Title 42, United States Code, Section 408(a)(7)(B) and Title 18, United States Code, Section 2.)

COUNT ELEVEN

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about September 10, 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court defendant, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” for the purpose of obtaining something of value, with intent to deceive, did knowingly, willfully, and unlawfully falsely represent the Social Security number of Darren C. Miller to be the Social Security account number assigned by the Secretary of the United States Department of Health and Human Services to him in order to obtain a fraudulent drivers license in the name of “Nathaniel A. Wright,” when, in fact, defendant ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” then well knew such number was not the Social Security account number assigned by the Secretary to him.

(In violation of Title 42, United States Code, Section 408(a)(7)(B) and Title 18, United States Code, Section 2.)

COUNT TWELVE

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about September 24, 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court defendants, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” and KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” aided and abetted by one another, for the purpose of obtaining something of value, with intent to deceive, did knowingly, willfully, and unlawfully falsely represent the Social Security number of Jerry M. Gentry to be the Social Security account number assigned by the Secretary of the United States Department of Health and Human Services to KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” in order to obtain a fraudulent drivers license in the name of “Christopher J. Harris,” when, in fact, defendants ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” and KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” then well knew such number was not the Social Security account number assigned by the Secretary to KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.”

(In violation of Title 42, United States Code, Section 408(a)(7)(B) and Title 18, United States Code, Section 2.)

COUNT THIRTEEN

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about September 24, 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court defendants, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” and SHAKIMA MOSES, aka “Shakyma Jones,” aka “Stephanie Davis,” aided and abetted by one another, for the purpose of obtaining something of value, with intent to deceive, did knowingly, willfully, and unlawfully falsely represent the Social Security number of “Stephanie Davis,” to be the Social Security account number assigned by the Secretary of the United States Department of Health and Human Services to SHAKIMA MOSES, aka “Shakyma Jones,” aka “Lacey Williams,” in order to obtain a fraudulent drivers license in the name of “Stephanie Davis,” when, in fact, defendants ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” and SHAKIMA MOSES, aka “Shakyma Jones,” aka “Stephanie Davis,” then well knew such number was not the Social Security account number assigned by the Secretary to SHAKIMA MOSES, aka “Shakyma Jones,” aka “Stephanie Davis,”

(In violation of Title 42, United States Code, Section 408(a)(7)(B) and Title 18, United States Code, Section 2.)

COUNT FOURTEEN

1. Paragraphs 1-6 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about October 18, 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court defendants, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka

“Mohammed Abullah,” and KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” aided and abetted by one another, for the purpose of obtaining something of value, with intent to deceive, did knowingly, willfully, and unlawfully falsely represent the Social Security number of Michael Washington to be the Social Security account number assigned by the Secretary of the United States Department of Health and Human Services to KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” in order to cash a counterfeit check at a Target store, when, in fact, defendants ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” and KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” then well knew such number was not the Social Security account number assigned by the Secretary to KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.”

(In violation of Title 42, United States Code, Section 408(a)(7)(B) and Title 18, United States Code, Section 2.)

COUNT FIFTEEN

1. Paragraphs 1-10 of Count One are realleged and incorporated by reference as if fully set forth herein.

2. On or about October 18, 2001, in the Eastern District of Virginia, and within the jurisdiction of this Court, defendants, ALVIN J. PATTON, aka “Nathaniel A. Wright,” aka “Mohammed Abullah,” and KEVIN A. MOSES, aka “Christopher J. Harris,” aka “Michael Washington,” aka “Edward S. Martin, Jr.,” aided and abetted by one another, knowingly, willfully, and with intent to defraud used one or more unauthorized access devices, obtained with

intent to defraud, and by such conduct obtained approximately \$6,100.00 in goods and services,
said use affecting interstate and foreign commerce.

(In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.)

A TRUE BILL

FOREPERSON

PAUL J. McNULTY
UNITED STATES ATTORNEY

By: _____
Sara E. Flannery
Special Assistant United States Attorney